

**AMENDMENTS TO THE DRAWINGS**

The attached replacement sheet of drawing includes changes to Fig. 12.

The replacement sheet has been amended to comply with 37 CFR 1.84(p)(5).

Attachment:      Replacement Sheet of Fig. 12.

**REMARKS**

Applicants thank the Examiner for the extremely thorough outstanding Office Action.

By this Amendment, the specification and drawing are amended, claims 2 and 10 are amended, and claims 11 and 12 have been added. No new matter is involved.

Reconsideration of the Application, as amended, is respectfully requested.

**Drawing Objections**

The drawing is objected to for failing to show every feature recited in the claims. This objection is respectfully traversed,

The drawing is objected to for not showing the doctor roller taking up ink from an ink reservoir. To overcome this objection, Applicants have amended the claims so that the doctor roller is not claimed.

The drawing is also objected to because they contain reference numerals 31 and 32 that are not mentioned in the written description of the invention. In order to overcome this objection, Applicants have amended the specification and the drawings so that elements with reference numerals in specification and shown in the drawing and so that elements with numerals that are shown in the drawing are the mentioned in the specification.

Accordingly, reconsideration and withdrawal of these objections are respectfully requested.

**Objection to the Specification**

The specification is objected to for inconsistent alphabetical labeling of the substrate web. This objection is respectfully traversed. Applicants have amended the specification to make the alphabetical labeling of the substrate web S consistent in the specification and between the specification and the drawing.

Accordingly, reconsideration and withdrawal of this objection are respectfully requested.

**Rejection under 35 USC §103**

Claims 2-10 stand rejected under 35 USC §103(a) as unpatentable over U.S. patent 4,572,069 to Schwarzbeck in view of U.S. Patent 4,878,427 to Washchynsky et al. (“Washchynsky”). This rejection is respectfully traversed.

Claim 1, as amended, recites a printing module provided with a frame, an impression roller, a plate cylinder assembly comprising a plate cylinder which is provided with a print image and which, in use, with interposition of a substrate to be printed, abuts against the impression roller, and an anilox roller arranged adjacent to the plate cylinder, such that a desired amount of ink is transferred by the anilox roller to the plate cylinder, the plate cylinder assembly being provided with a stationary shaft on which the plate cylinder is rotatably bearing-mounted, while on opposite sides of the plate cylinder a support is fixedly connected with the stationary shaft, the printing module comprising two receiving units disposed on opposite sides of the plate cylinder, which are connected with the frame, in which receiving units rest the supports when the plate cylinder assembly in the operative position is mounted in the printing module, while fixation means are provided for fixating the plate cylinder assembly in the receiving units,

wherein the fixation means are situated substantially under the plate cylinder assembly, and wherein the fixation means comprise two rods which, at an upwardly directed end, are provided with a hook, the two hooks, on opposite sides of the plate cylinder, engaging the stationary shaft of the plate cylinder assembly when the plate cylinder assembly is in the operative position, and means for exerting a pull force on the two rods for pressing the plate cylinder assembly into the receiving units.

Claim 10 recites a printing machine provided with at least one printing module provided with a frame, an impression roller, a plate cylinder assembly comprising a plate cylinder which is provided with a print image and which, in use, with interposition of a substrate to be printed, abuts against the impression roller, and an anilox roller, the anilox roller being arranged adjacent to the plate cylinder, such that a desired amount of ink is transferred by the anilox roller to the plate cylinder, the plate cylinder assembly being provided with a stationary shaft on which the plate cylinder is rotatably bearing-mounted, while on opposite sides of the plate cylinder a support is fixedly connected with the stationary shaft, the printing module comprising two receiving units disposed on opposite sides of the plate cylinder, which are connected with the frame, in which receiving units rest the supports when the plate cylinder assembly in the operative position is mounted in the printing module, while fixation means are provided for fixating the plate cylinder assembly in the receiving units, wherein the fixation means are situated substantially under the plate cylinder assembly, wherein the fixation means comprise two rods which, at an upwardly directed end, are provided with a hook, the two hooks, on opposite sides of the plate cylinder, engaging the stationary shaft of the plate cylinder assembly when the plate cylinder assembly is in the operative position, and, means for exerting on the two

rods a pull force for pressing the plate cylinder assembly into the receiving units when the plate cylinder is in the operative position.

Schwarzbeck does not disclose, or suggest, several positively recited features in claims 1 and 10.

Firstly, Schwarzbeck's plate cylinder 7 is not operated by the relied upon swiveling device 20 that is relied upon in the rejection as allegedly dealing with a plate cylinder and a plate cylinder assembly. Schwarzbeck's swiveling device 20 only moves a "numbering and imprinting device 2" into and out of contact with a sheet to be numbered. There is absolutely no explicit or inherent disclosure in Schwarzbeck that its "numbering and imprinting device 2" is a "plate cylinder," as claimed.

A claim limitation is inherent in the prior art if it is necessarily present in the prior art, not merely probably or possibly present. *See Rosco v. Mirro Lite*, 304 F.3d 1373, 1380, 64 USPQ2d 1676 (Fed. Cir. 2002).

In Applicants' experience, numbering and imprinting devices may employ a plurality of side-by-side number wheels which rotate about a common axis, and that is certainly not a "plate cylinder." It isn't even a plate.

Secondly, even if, solely for sake of argument, Schwarzbeck's "numbering and imprinting device 2" were to be a "plate cylinder," Schwarzbeck's does not disclose means for exerting a pull force on Schwarzbeck's angular lever arms 21, 22 for pressing the numbering and imprinting device into receiving units.

In this regard, it appears that the numbering and imprinting device 2 is merely transported to and from its operative location by the angular lever arms 21, 22, and is locked into

working/operative position by being “locked into the half-shell bearing” – see col. 7, lines 36-42.

The clamping/locking unit details are set forth in col. 7, lines 10-29.

It has to be remembered in this regard, that there is no explicit disclosure that Schwarzbeck's has means for providing a pull force arms on its angular lever arms 21, 22 for pressing the numbering and imprinting device into receiving units. Nor is there any such inherent disclosure in Schwarzbeck. The Examiner may speculate that there is such a disclosure in Schwarzbeck, but has not provided convincing reasoning that such a disclosure necessarily exists in Schwarzbeck. In fact, Applicants believe that Schwarzbeck's angular lever arms, which are located underneath numbering and imprinting device 2 when device 2 is being loaded into its operating/working position, and appear to support the downward force due to the weight of the numbering and imprinting device 2 in its operative/working position , thereby pushing up against that force.

Nor does Schwarzbeck disclose an anilox roller inking arrangement with respect to its numbering and imprinting device 2. In fact, because there are no details of Schwarzbeck's numbering and imprinting device 2, and because the Office Action has not shown that such numbering and imprinting devices conventionally employ an anilox roller, the office Action fails to make out a *prima facie* case that one of ordinary skill in the art would be properly motivated to provide an anilox roller for Schwarzbeck's numbering and imprinting device 2. In this regard, Applicants note that Schwarzbeck does not disclose that its numbering and imprinting device 2 is a plate cylinder which is expected to use an anilox roller.

Thus, Schwarzbeck does not disclose the claimed invention and is lacking a number of positively recited elements of the positively recited invention, and the Office Action has

provided any objective evidence that one of ordinary skill in the art would be properly motivated to modify Schwarzbeck to substitute a plate cylinder for Schwarzbeck's numbering and imprinting device 2, or to fundamentally redesign Schwarzbeck's swiveling device 20 to include the pull and press feature of claim 1, or to substitute an anilox roller in its inking system.

In an attempt to address the shortcomings of Schwarzbeck, the Office Action turns to Washchynsky.

Unfortunately, Washchynsky is directed to a fundamentally different type of printing device than Schwarzbeck's relied upon numbering and imprinting device 2. Washchynsky addresses moving plate cylinders into and out of a full fledged flexographic printing system rather than moving non-flexographic numbering and imprinting devices 2 into and out of a printing system.

Additionally, Washchynsky differs so substantially from Schwarzbeck that it teaches away from being combined with Schwarzbeck as suggested in this rejection for a number of reasons.

Firstly, Washchynsky's plate cylinder 58 is raised and lowered by applying pneumatic pressure to a bearer disc 90 independently from the separate, screw type mechanical adjusting mechanisms 104 and 106 that are used to interact with bearer surfaces 92 and 95 that are used to adjust the positions of impression roller 100 and anilox roller 102. This is significantly different than the previously explained numbering and imprinting device 2 exchange mechanism of Schwarzbeck. For this reason alone, one of ordinary skill in the art would not turn to Washchynsky to modify Schwarzbeck either to change the type of inking system for

Schwarzbeck's auxiliary numbering and imprinting device 2, which clearly does not use, or contemplate use of an anilox roller, or to otherwise modify Schwarzbeck's swiveling device 20.

The proposed modification of Schwarzbeck in view of Washchynsky focuses on the doctor roller and anilox roller arrangement. However, the claims, as amended, no longer recite a doctor roller and, as discussed above, the Office Action has not provided objective factual evidence that one of ordinary skill in the art would be properly motivated to modify Schwarzbeck to employ an anilox roller for its auxiliary numbering and imprinting device 2.

With respect to claim 3, Schwarzbeck does not disclose a "piston-cylinder assembly," as claimed, nor does Schwarzbeck disclose the pull force feature of the claim, and Washchynsky is not applied with respect to these features.

With respect to claim 5, Schwarzbeck's angular lever arms 21, 22 are not disclosed as being rods with longitudinal axes and/or wherein upward movement of the rods in the direction of the longitudinal axes of the rods automatically enters into engagement with the stationary shaft and thereby lifts the plate cylinder assembly from the receiving units

With respect to claim 6, the Office Action fails to establish that the half shells 51 of Schwarzbeck are explicitly or inherently (i.e., not just possibly, and not just probably, but necessarily) disclosed as having a particular curve, the curve being such that the distance between plate cylinder and the anilox roller on the one hand and the distance between the plate cylinder and the impression roller on the other in each case remain, in pairs, mutually equal at different diameters of plate cylinders, which are provided with rings of diameters matching the plate cylinders.

As noted above, Schwarzbeck has no anilox roller and the office Action does not establish a *prima facie* case that one of ordinary skill in the art would be properly motivated to provide on in Schwarzbeck.

Additionally, if Schwarzbeck's half cylinders 51 really have a particular curve, the curve being such that the distance between plate cylinder and the anilox roller on the one hand and the distance between the plate cylinder and the impression roller on the other in each case remain, in pairs, mutually equal at different diameters of plate cylinders, which are provided with rings of diameters matching the plate cylinders, then why does Schwarzbeck not mention it and why does Schwarzbeck provide the additional locking features shown, for example, in Fig. 4.

### **New Claims**

Claims 11 and 12 are added. Claim 11 patentably defines over the applied art at least for reasons discussed above regarding claims 1 and 10 which recite a common number of features with claim 11. Additionally, neither applied reference discloses or suggests fixation means that are situated substantially under the plate cylinder assembly and not above the top of the plate cylinder to permit free access to the plate cylinder assembly from above the plate cylinder assembly.

With respect to claim 12, this claim patentably defines over the applied art for reasons similar to those presented above regarding the patentability of claim 6.

**Conclusion**

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Robert J. Webster, Registration No. 46,472, at (703) 205-8000, in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.147; particularly, extension of time fees.

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Respectfully submitted,

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Attachment: Drawing Replacement Sheet of Fig. 12